

March 22, 2023

Notice of Rejected Service of Process – Log# 543463488

Agent Served: CT Corporation
Party Served: Indorama Ventures Oxides, LLC
Jurisdiction Served: New York
Title of Action: Re: Star Lake Canal Superfund Site located in and around the cities of Port Neches and Groves,
Jefferson County, Texas // To: Indorama Ventures Oxides, LLC
Case No.

Dear Sir/Madam:

We have received documents from you in the above-referenced matter, but we are not able to forward the documents to any party due to the reason indicated below.

☒ **Not Agent:** According to our records and/or the records of the Secretary of State, we are not the registered agent for the company you are attempting to serve.

☐ **Documents Do Not Correctly Identify the Intended Recipient:** The name of the party that you are trying to serve appears to be incomplete and/or there are other errors in how you have identified the party that you are trying to serve. Our company is the registered agent for service of process for hundreds of thousands of entities, and because of your errors in identifying the party that you are trying to serve, we are unable to determine the identity of the party that you are attempting to serve.

☐ **Inactive Entity:** The entity that you are attempting to serve is either discontinued on our records and/or inactive with the Secretary of State. Accordingly, we no longer have any active agreement with the entity to operate as its registered agent for service of process, and we no longer have current delivery instructions on file.

To be clear, for the aforementioned reason(s), we have not been able to forward the documents that you are attempting to serve to any entity. We are writing this letter to you so that you can take action to address the problems that we have identified. If you do not correct the errors identified herein, the party you are trying to serve will not receive notice of these documents.

Please email SOPInquiries@wolterskluwer.com if you believe that you have received this letter in error or if you need further assistance.

Very truly yours,
C T Corporation System

(Returned To)

SUSAN WEBSTER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1201 ELM STREET, SUITE 500,
DALLAS, TX 75270

RECEIVED

23 APR -4 PM 2:35

SUPERFUND DIV.
DIRECTOR'S OFC.



100029134



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

March 9, 2023

SPECIAL NOTICE AND DEMAND LETTER

URGENT LEGAL MATTER, PROMPT REPLY NECESSARY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED #7020 0640 0000 9754 0248

Indorama Ventures Oxides, LLC
c/o Corporation Service Company dba CSC - Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, Texas, 78701-3218

Re: Special Notice of Potential Liability and Draft Consent Decree
Star Lake Canal Superfund Site located in and around the cities of Port Neches and Groves,
Jefferson County, Texas
SSID No. 06GY, EPA ID No. TX0001414341

Dear Sir or Madam:

This letter is to notify Indorama Ventures Oxides LLC, (hereinafter Indorama, you or your) of its potential liability under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and invite you to enter into negotiations with the U.S. Environmental Protection Agency (EPA) to resolve your responsibility for the cleanup of the Star Lake Canal Superfund Site (Site) located in and around the cities of Port Neches and Groves, Jefferson County, Texas. Based on available information, the EPA has determined that due to hazardous substances originating from property you either own and/or operated in Jefferson County, Texas, such hazardous substances may have been released into the Jefferson and/or Star Lake Canals and/or the Molasses Bayou Wetland and/or the Molasses Bayou Waterway in Jefferson County, Texas. The Molasses Bayou Wetland and the Molasses Bayou Waterway are two of the seven areas of interest ("AOI") at the Site. The other five AOI's are Gulf States Utility Canal, Star Lake Canal, Former Star Lake, Jefferson Canal Spoil Pile and Jefferson Canal (Enclosure 1).

Therefore, the EPA has determined that Indorama is a potentially responsible party (PRP) within the meaning of Section 107(a)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), 42 U.S.C. § 9607(a)(3). Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), parties who have arranged for disposal of hazardous substances at Superfund sites are liable for the cleanup of the Site, including all costs incurred by the EPA in responding to releases at the Site.

Under the federal Superfund law, you and the other PRP at the Site are responsible for the costs of cleaning up the Site. The decision by the EPA on the cleanup approach to be implemented at the Site is embodied in a final Record of Decision (ROD), executed on September 30, 2013 (Enclosure 2). In addition, the Star Lake Canal Cooperating Parties Group ("Group") is currently performing a Remedial Design at the Site pursuant to the enclosed Settlement Agreement and Administrative Order on Consent for Remedial Design (AOC) which include the Statement of Work (SOW) issued on September 26, 2016 (Enclosures 3 & 4).

U.S. EPA Region 6
Ken Talton, Enforcement Officer
1201 Elm Street, Suite 500
Mail Code: SEDAE
Dallas, Texas 75270-2102



DALE 01/10/2023
FRI 10 JAN 2023
AFSM 271 21:48:45

Goodrich Corporation
c/o C T Corporation System
28 Liberty Street
New York, New York 10005

Handle with Care / Fragile



CT

Undeliverable mail only to:
3 University Plaza Drive, Suite 506
Hackensack, NJ 07601



quadiant

FIRST-CLASS MAIL
IMI

\$001.74⁰

03/30/2023 ZIP 10005
043M31232245

US POSTAGE

Related DAID 90126013
Spec Not Let, Demand Letter,
Draft Consent Decree sent
to Indorama Ventures Oxides LLC
Tracking No 7020 0640 0000 9704 0248

Scanned & emailed
to Susan.
4/4/23